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## UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

JULIAN SILVA, ET AL

Plaintiffs,

٧.

JOSE VAZQUEZ COFRESI, ET AL

Defendants.

JOSE VAZQUEZ

Counterclaimant.

٧.

**JULIAN SILVA** 

Counterclaim Defendant

ECF CASE

Case No. 13-cy-3200-CM

**CONSENT MOTION FOR** 

PROTECTIVE ORDER EMO ENDORSED

Motion granted. Belle he had

Defendants JOSE VAZQUEZ COFRESI ("Vazquez"), individually, and HANDLE WITH CARE PRODUCTIONS, INC. ("Handle With Care") and Plaintiffs JULIAN SILVA, individually, and JULIAN SILVA, on behalf of HANDLE WITH CARE PRODUCTIONS, INC. hereby move this Court, pursuant to the Local Rules and this Court's Individual Practices, for entry of the Stipulated Protective Order attached hereto.

Respectfully submitted:

Dated: September 16, 2013

/s/ Michael D. Steger

Michael D. Steger (MS2009) Steger Krane LLP Attorneys for Defendants 1601 Broadway, 12th Floor New York, NY 10019 (212) 736-6800 (845) 689-2155 (fax) msteger@skattorney.com

Attorneys for Defendants and Counterclaimant

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## CERTIFICATE OF SERVICE

I hereby certify that on this September 16, 2013 I served a true and correct copy of the attached Consent Motion for Protective Order electronically by ECF on counsel for all parties:

Peter C. Dee Mavronicolas, Muller & Dee, LLP 950 Third Avenue, 10<sup>th</sup> Floor New York, NY 10022 pdee@mavrolaw.com

/s/ Michael D. Steger
Michael D. Steger